

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**[PROPOSED] ORDER  
EXCLUDING THE  
OPINIONS OF EDWARD H.  
KAPLAN, M.D.**

**ORDER**

**THIS MATTER**, having been opened to the Court by Defendants for entry of an order excluding the opinions of Plaintiffs' expert Edward H. Kaplan, M.D., and the Court having considered the submissions of the parties and having heard oral argument, and for good cause shown:

**IT IS** on this \_\_\_\_ day of \_\_\_\_\_, 2022

**ORDERED** as follows:

Defendants' Joint Motion to Exclude the Opinions of Edward H. Kaplan, M.D. is Granted in its entirety.

\_\_\_\_\_  
Hon. Robert B. Kugler, U.S.D.J.